

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC,

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY  
RESOURCE CENTER INC., d/b/a  
ATTLEBORO WOMEN'S HEALTH CENTER,  
CATHERINE ROMAN, NICOLE CARGES,  
and DARLENE HOWARD,

Defendants.

Civil Action No. \_\_\_\_\_

**[PROPOSED] ORDER PERMITTING LIMITED EXPEDITED DISCOVERY**

Pursuant to Rule 26(d) of the Federal Rules of Civil Procedure and 45 C.F.R. §

164.512(e)(1), the Court orders as follows:

1. Four Women may begin to serve discovery requests on the date this Order is entered.
2. Four Women may serve upon the Defendants up to five (5) requests for the production of documents and five (5) interrogatories. Responses to these requests and interrogatories, including the production of documents, shall be due within fifteen (15) days of service.
3. Four Women may serve a subpoena on non-parties Klara Technologies, Inc., Athenahealth, Inc., AWHC's phone carrier, and AWHC's texting platform. The subpoenas shall contain no more than five (5) document requests. Responses to these subpoenas, including the production of responsive documents, shall be due within fifteen (15) days of service.
4. Four Women may conduct depositions of AWHC, pursuant to Fed. R. Civ. P. 30(b)(6), and any person who called or contacted Jane Does 5-8 as described in the Complaint.

The depositions shall be conducted and completed within ten (10) days of AWHC's production of documents.

5. The parties shall make reasonable efforts to resolve discovery disputes within three (3) business days. If discovery disputes cannot be resolved within three (3) business days, a party may seek relief from the Court by filing an emergency motion pursuant to this Order. Any opposition to such an emergency motion shall be filed within three (3) business days. Any party may request that the Court schedule an emergency hearing on an expedited basis, and the Court in its discretion may issue a ruling without a hearing.

6. This schedule of expedited discovery shall not be construed to limit the parties' rights to further discovery consistent with the applicable rules. Any discovery taken pursuant to this Order for expedited discovery shall not be counted for purposes of determining whether a party has exceeded the discovery limitations set forth in applicable rules.

SO ORDERED

By the Court:

---

Date: